WILMER CUTLER PICKERING HALE AND DORR LLP
John A. Rogovin (pro hac vice)
Randolph D. Moss (pro hac vice)
Samir C. Jain # 181572
Brian M. Boynton # 222193
Benjamin C. Mizer (pro hac vice)
1875 Pennsylvania Ave, NW
Washington, DC 20006
Tel.: 202-663-6000
Fax: 202-663-6363
Email: john.rogovin@wilmerhale.com

Randal S. Milch (pro hac vice)
Verizon Communications Inc.
One Verizon Way
VC43E043
Basking Ridge, NJ 07920
Tel.: 908-559-1752
Fax: 908-696-2136
Email: randal.s.milch@verizonbusiness.com

MUNGER, TOLLES & OLSON LLP
Henry Weissmann # 132418
Susan R. Szabo # 155315
Aimee A. Feinberg # 223309
355 South Grand Avenue
35th Floor
Los Angeles, CA 90071-1560
Tel.: 213-683-9100
Fax: 213-683-5150
Email: Henry.Weissmann@mto.com

Attorneys for Verizon Communications Inc., Verizon Global Networks Inc., and MCI, LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE:

NATIONAL SECURITY AGENCY TELECOMMUNICATIONS RECORDS LITIGATION

This Document Relates To:

No. 06-220 (D.R.I.)
No. 1:06-cv-632 (E.D. Cal.)
No. cv-06-77 (D. Mont.)
No. 06-2491 (D. La.)
No. cv-06-694 (D. Ore.)
No. 1:06-cv-2680 (N.D. Ill.)
No. 06-224 (D.R.I.)
No. 3:06-cv-3574 (N.D. Cal.)
No. 3:06-cv-4221 (N.D. Cal.)

MDL NO. 06-1791 VRW

[PROPOSED] ORDER GRANTING VERIZON'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION

Judge: Hon. Vaughn R. Walker

On April 30, 2007, Defendants Verizon Communications Inc., Verizon Global Networks Inc., and MCI, LLC filed a Motion To Dismiss for Lack of Personal Jurisdiction. Having considered the motion and supporting memorandum filed by the moving Verizon defendants, the opposition of Plaintiffs, the moving Verizon defendants' reply memorandum, and the arguments of counsel, and finding that there is good cause supporting the relief requested in Verizon's motion,

IT IS HEREBY ORDERED that

1. Verizon's Motion To Dismiss is GRANTED on the ground that the Court lacks general and specific jurisdiction over the moving Verizon defendants with respect to the cases listed above in the caption; and

2. The claims against the moving Verizon defendants in the cases listed above in the caption are dismissed.

The Clerk shall enter judgment accordingly.

Dated: ____________________ ________________________________

Vaughn R. Walker
United States District Chief Judge